

**Easterling, Deborah**

273491

**From:** Easterling, Deborah  
**Sent:** Wednesday, December 13, 2017 11:43 AM  
**To:** 'Christopher Worley'  
**Subject:** RE: Public comment - 2014-246-E

Dear Mr. Worley,

This is to acknowledge receipt of your emailed correspondence to the Public Service Commission of South Carolina.

Your Comments will be placed in the Docket listed below and on the Commission's Website at [www.psc.sc.gov](http://www.psc.sc.gov).

- Docket No. 2014-246-E – Petition of the Office of Regulatory Staff to Establish Generic Proceeding Pursuant to the Distributed Energy Resource Program Act, Act No. 236 of 2014, Ratification No. 241, Senate Bill No. 1189

You can follow this Docket and other daily filings made at the Commission by subscribing to the Commission's Email Subscriptions at this link: <https://dms.psc.sc.gov/Web/Email>; or you can follow Docket No. 2014-246-E at this link: <https://dms.psc.sc.gov/Web/Dockets/Detail/115074>.

If we may be of further assistance to you, please do not hesitate to contact us.

Sincerely,

Deborah Easterling  
 Executive Assistant  
 803-896-5133

**From:** Christopher Worley [mailto:christopher.worley@vivintsolar.com]  
**Sent:** Monday, December 11, 2017 11:23 AM  
**To:** PSC\_Contact <Contact@psc.sc.gov>  
**Subject:** Public comment - 2014-246-E

Hello,

I would like to submit the following public comment letter into the record of docket number 2014-246-E. Please let me know if you have any questions.

Regards,

Christopher Worley  
 Director of Rate Design  
 Vivint Solar

**RECEIVED**

DEC 13 2017

PSC SC  
 MAIL / DMS

This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity named. If you have received this e-mail by mistake, please notify the sender immediately by e-mail. This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity named. If you have received this e-mail by mistake, please notify the sender immediately by e-mail.

The information in this e-mail is for the use of the designated recipient only. If you are not the designated recipient, you should not disseminate, distribute or take any action in reliance on the information. If you have received this e-mail by mistake, please notify the sender immediately by e-mail.



**December 7, 2017**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Petition to Establish Generic Proceeding Pursuant to the Distributed Energy  
Resource Program Act, Act No. 236 of 2014, Ratification No. 241, Senate Bill No. 1189  
Docket No. 2014-246-E

**Dear Ms. Boyd**

Vivint Solar respectfully submits the following public comments in support of the Alliance for Solar Choice's ("TASC") motion to compel. With more than 120,000 rooftop solar projects installed in 21 states, Vivint Solar has deep expertise serving customers wanting to invest in rooftop solar. Vivint Solar markets, designs, installs, and maintains rooftop solar systems offering customers the ability to use flexible financing options, power purchase agreements, or lease agreements, where available.

In 2014, Act 236 removed barriers, enabling solar installers like Vivint Solar to serve the needs of customers wanting to invest in rooftop solar. Over the past two years, Vivint Solar has installed more than 10 MW of solar on over 1,000 South Carolina roofs. While Vivint Solar has had success serving customers, the process of deploying solar has many steps, some of which are beyond the control of the installer.

On average, the process from first contact to installation of the PV system can take 4-8 weeks, or more, depending on a variety of factors specific to the customer. Additionally, the process from installation of the system to receiving permission to operate will vary greatly. Generally, installers will conduct an engineering site visit, secure financing, obtain permits, and receive pre-install approval from the utility all before a project is installed. Once installed, projects must be inspected for safety by a building code official or by the utility before receiving permission to operate. Unforeseen delays at any step can lead to multi-week delays, which could jeopardize the net metering program participation.



A lack of transparency regarding the status of utility net metering program could significantly deter customers from choosing to participate in the program. Doing business when nearing a program cap is risky for both customers and solar installers who offer third-party lease products. It is likely that without frequent updates on the status of the net metering program, there will be a large group of customers who are far along in the process to install a PV system when the program is closed, which is both costly to installers and frustrating for customers. That risk will ultimately increase costs to consumers. Accurate information on program status will better help installers minimize the number of customers in the aforementioned group, reducing the risk and thereby reducing average costs to consumers. Vivint Solar supports TASC's recommendation for monthly updates up to 80% program capacity, weekly updates up to 90% program capacity, and daily updates until the program closes.

Vivint Solar appreciates this opportunity to provide comments and recommendations to the Public Service Commission of South Carolina.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Worley".

Christopher Worley  
Director of Rate Design  
Vivint Solar